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ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 3/3/17

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MEMO ENDORSED

March 3, 2017

VIA ECF

Hon. Colleen McMahon  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

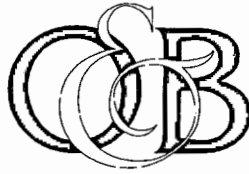
Re: *AmTrust North America, Inc., et al. v.*  
*Safebuilt Insurance Services, Inc. et al.*  
Index No. 14 CV 9494 (CM) (SDNY)  
Our File No. 3639-006

3/3/2017  
OK -  
Keep talking.  
This case should  
settle  
✓

Dear Judge McMahon:

We represent Plaintiffs in the above-referenced litigation, the related arbitration and in two post-judgment "Turnover" proceedings pending before Your Honor. I write on behalf of all parties to the above-referenced litigation.

On January 23, 2017 Your Honor granted the parties' joint request for a 45 day extension for the filing of summary judgment motions and a joint pre-trial order to March 17, 2017. That extension was granted to allow settlement discussions to proceed as outlined and to help preserve insurance limits for the Defendants. During the past month, real progress has been made on each piece of the structure for the global settlement described in the original request for an extension. For example, the London reinsurer that is to replace Plaintiffs in the insurance Program through a novation has had direct conversations with Plaintiffs and has successfully completed its due diligence and received the approval of its senior management to proceed with the novation. We are now awaiting the formal documents from the non-party "fronting insurer," United Specialty Insurance Company, to consummate the novation. With regard to the balance of the global settlement, the parties are continuing their discussions both privately and through the mediation under the JAMS' auspices. We believe real progress has been made, but some issues still remain



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to be resolved. Should Your Honor desire more details, we would be happy to provide them in either a telephone conference or at a conference with Your Honor.

In short, we have made real progress toward a global settlement. However, the parties believe more time is needed to conclude these discussions and to document a final resolution. Accordingly, the parties jointly request that Your Honor grant another extension to Friday, April 28, 2017.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Michael D. Brown'. The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Michael D. Brown

MDB/bp